WP KVGF "UVCVGU'F KUVT KEV'EQWT V
HQT"VJ G'F KUVT KEV'QH'UQWVJ "ECT QNKP C
EJ CT NGUVQP "F KXKUKQP

TQDGT V'O CEM'DWT T KU. Rnckpvkhh. xu0 Y CVGT HT QP V'GO RNQ[GTU/KNC RGP UKQP "CP F "Y GNHCT G'HWP F. F ghgpf cpv0	Ekxkn'Cevkqp P q04<35/ex/24; ; 9/TO I **DEFENDANT'S LOCAL RULE 26.01 DISCLOSURE**

F ghgpf cpv'Y cvgthtqp'Go r nq{gtu/KNC "Rgpukqp"cpf " Y grhctg"Hwpf ."d{"cpf "vj tqwi j "ku wpf gtuki pgf "eqwpugn'j gtgd{"tgur qpf u'vq"Nqecn'Twng"48021"cu'hqnqy u<

C0   Uvcvg"vj g"hwnn'pco g."cf f tguu."cpf "vgngr j qpg"pwo dgt"qh'cnn'r gtuqpu"qt"ngi cn'gpvkvkgu y j q"o c{"j cxg"c"uwdtqi cvkqp"kpvgtguv'kp'gcej "encko "cpf "uvcvg"vj g dcuku'cpf "gzvgpv'qh'uckf "kpvgtguv0

CP UY GT<   P qpg0

D0   Cu'vq"gcej "encko .'uvcvg"y j gvj gt"kv'uj qwnf "dg"vtkgf "d{ lwt{"qt"pqplwt{"cpf "y j {0

CP UY GT<   Vj ku"ecug"ku"tgcm{"pqyj kpi "o qtg"y j cp"c"i ctf gp"xctkgv{"cnngi gf "dgpghkv f gpkcn'ecug"wpf gt"vj g"Go r nq{gg"Tgvktgo gpv'Kpeqo g"Ugewtkv{"Cev'qh'3; 96."cu'co gpf gf 0"Cu'uwej . kv'o c{"pqv'dg"vtkgf "dghqtg"c"lwt{"cpf "uj qwnf "dg"c"pqplwt{"vtkcn'kh'cp{0 _Ugg."g0 0"Rj gnr u'x0'EV Gpvgtr tkugu."Kpe0"3; 96"H05f "435."444"*6^{yj} Ekt0'4227+=_ _Dki i gtu'x0'Y kvgm'Kpf wu0"Kpe0"6"H05f "4; 3. 4; 9/4; ; "*6^{yj} Ekt03; ; 5+0_

E0   Uvcvg"y j gvj gt"vj g"r ctv{"uwdo kwkpi "vj gug"tgur qpugu"ku"c"r wdnken{"qy pgf eqo r cp{ cpf "ugr ctcvgn{"kf gpvkh{<'*3+'gcej "r wdnken{"qy pgf "eqo r cp{"qh y j kej "kv'ku"c r ctgpv."uwdukf kct{. r ctvpgt."qt"chhknkcvg="*4+"gcej "r wdnken{ qy pgf "eqo r cp{"y j kej "qy pu'vgp"r gtegpv'qt"o qtg"qh'vj g qwuvcpf kpi "uj ctgu qt"qvj gt"kpf kekc"qh'qy pgtuj kr "qh'vj g"r ctv{= cpf "*5+"gcej "r wdnken{"qy pgf eqo r cp{"kp'y j kej "vj g"r ctv{"qy pu'vgp"r gtegpv'qt"o qtg"qh'vj g"qwuvcpf kpi uj ctgu0

CP UY GT<   P 1C0

F0   Uvcvg''yj g dcuku''hqt''cuugtvkpi ''yj g''encko ''kp''yj g''f kxkukqp''kp''y j ej ''kv''y cu''hkngf *qt''yj g dcuku''qh''cp{''ej cngpi g''vq''yj g''crr tqr tkcvgpguu''qh''yj g''f kxkukqp+0

CP UY GT<   P 1C0

G0   Ku''yj ku''cevkqp''tgncvgf ''kp''y j qng''qt''kp''r ctv''vq''cp{''qyj gt''o cwgt''hkngf ''kp''yj ku F kuvtkev. y j gyj gt''ekxkn''qt etko kpcnA Ku''uq. ''r tqxkf g<''*3+''c''uj qtv''ecr vkqp''cpf yj g''hwnn''ecug''pwo dgt''qh''yj g tgncvgf ''cevkqp=''*4+''cp''gzr ncpcvkqp''qh''j qy ''yj g o cwgts''ctg''tgncvgf =''cpf ''*5+''c''uvcvgo gpv''qh''yj g''uvcwwu qh''yj g''tgncvgf ''cevkqp0 Eqwpugn''uj qwnf ''f kuenqug''cp{''ecugu''y j ej *may be* tgncvgf ''tgi ctf nguu''qh y j gyj gt''yj g{''ctg''uvknn''r gpf kpi 0 Y j gyj gt''ecugs *are* tgncvgf uwej ''yj cv''yj g{ uj qwnf ''dg''cuuki pgf ''vq''c ukpi ng''lwf i g''y knn''dg''f gvgto kpgf ''d{''yj g''Engtm''qh Eqwtv''dcugf ''qp''c''f gvgto kpcvkqp''qh''y j gyj gt''yj g ecugu<''ctkug''htqo ''yj g''uco g qt''kf gpvkecn vtcpucevkqpu. ''j cr r gpkpi u. ''qt''gxgpvu=''kpxqnxg''yj g''kf gpvkecn r ctvkgu''qt''r tqr gtv{='qt''hqt''cp{ qyj gt''tgcuqp''y qwnf ''gpvckn'uwduvcpvkcn f wr nkecvkqp''qh''ncdqt''kh''j gctf d{ ''f khhgtgpv''lwf i gu0

CP UY GT<   Rgt''yj g''cwcej gf ''g/mail from Judge Norton's Judicial Assistant dated O ctej 34. '' 4236. '' yj ku''ecug ''crtgcf { ''o c{ '' j cxg ''dggp ''tg/cuuki pgf '' vq ''Lwf i g I gti gn'' r gt '' c f gvgto kpcvkqp''qh''c''tgncvgf ''ecug. ''y j kej ''ecug''y cu''yj g''uwdlgev''qh''c''uvkr wncvgf ''f kuo kuucn''kp''42350 J qy gxgt. ''F ghgpf cpv''ku''tgur qpf kpi ''vq''yj g''Eqo r nckpv''cu''ugtxgf ''wr qp''kv0

Dear Mr. Wigger,

Thank you for your letter in response to my email. I shared your letter with Judge Norton, who did some research in ECF on your recently filed cases in federal court. He found that the above referenced case was related to an earlier case that was assigned to Judge Gergel - Burris v Waterfront Employers, C/A No. 2:13cv515 RMG. In addition, this case is related to a more recently filed case of yours - Burris v South Atlantic, C/A No. 2:14cv77 RMG - which is also before Judge Gergel. Therefore, Judge Norton is instructing the Clerk's Office to reassign this case to Judge Gergel. You should receive a notice later this week regarding the reassignment.

As Judge Norton discussed with you a few weeks ago, please instruct your staff to note any related cases on the Local Rule 26.01 Answers to Interrogatories when filing new cases. It saves the parties and the court significant time and resources when a case is correctly assigned to a judge from the outset.

Should you have any questions or concerns, please feel free to contact me.

Sincerely,
Lisa Richberg,
Judicial Assistant
Chambers of Honorable David C. Norton
United States District Court
(843) 579-1450

F.   If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER: The Defendant should be corrected to Waterfront Employers – ILA Pension Fund. Defendant's counsel will accept service of any amended pleadings as necessary.

G.   If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

ANSWER: N/A.

Dated at Charleston, this 11th day of April, 2014.

HAYNSWORTH SINKLER BOYD, P.A.
134 Meeting Street, Third Floor (29401)
P. O. Box 340
Charleston, SC 29402-0340

By: /s/ Charles H. Gibbs, Jr.
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Federal I.D. No. 5602
cgibbs@hsblawfirm.com

Attorneys for the Defendant

DM: 2679099 V.1